



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

May 29, 2003

CERTIFIED MAIL # 7000 1670 0013 9128 9677

Mr. Mike Burke
General Manager
Amcor Precast
16419 Ten Lane
Nampa, ID 83687

RE: AIRS Facility No. 027-00085, Amcor Precast, Nampa
Final Tier II Operating Permit and Permit to Construct

Dear Mr. Burke:

The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No. T2-020011 to Amcor Precast, in accordance with the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400 - 470 and 58.01.01.200 - 228, respectively.

The enclosed permit is effective immediately and is based on the information contained in your permit application and on the relevant comments received during the public comment period. Modification to and/or renewal of this permit shall be requested in a timely manner in accordance with the *Rules for the Control of Air Pollution in Idaho*.

Tom Krinke of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Please be aware a processing fee of \$2,500.00 applies in accordance with IDAPA 58.01.01.407.01. The processing fee is due within 45-days of receipt of this letter and the final permit. Please remit your fee payment to the address listed in IDAPA 58.01.01.408.01.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

C. Stephen Allred, Director
Department of Environmental Quality

CSA/br

Permit No. T2-020011

Enclosure

cc: Tom Krinke, Boise Regional Office
Sherry Davis, Technical Services
Laurie Kral, EPA Region 10



**Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: T2-020011

AIR FACILITY NO.: 027-00085

AQCR: 064

CLASS: B

SIC: 3272

ZONE: 11

UTM COORDINATE (km): 533.7, 4828.7

1. PERMITTEE
Amcor Precast

2. PROJECT
Initial Permit to Construct and Tier II Operating Permit

3. MAILING ADDRESS
16419 Ten Lane

CITY
Nampa

STATE
ID

ZIP
83687

4. FACILITY CONTACT
Mike Burke

TITLE
General Manager

TELEPHONE
(208) 465-0176

5. RESPONSIBLE OFFICIAL
Mike Burke

TITLE
General Manager

TELEPHONE
(208) 465-0176

6. EXACT PLANT LOCATION
16419 Ten Lane, Nampa, Idaho

COUNTY
Canyon


7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Precast concrete products

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470. and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 et al.


C. STEPHEN ALLRED, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: May 29, 2003

DATE EXPIRES: May 29, 2008

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ACRONYMS, UNITS AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AIRS	Aerometric Information Retrieval System
AQCR	air quality control region
CFR	Code of Federal Regulations
CO	carbon monoxide
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr/dscf	grain per dry standard cubic feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound
yd ³	cubic yards
yd ³ /day	cubic yards per day

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-020011**Permittee:** Amcor Precast
Location: Nampa, Idaho**AIRS FACILITY No.** 027-00085**Date Issued:** May 29, 2003**Date Expires:** May 29, 2008**1. PERMIT SCOPE*****Purpose***

- 1.1 The purpose of this permit is to establish enforceable limits necessary to demonstrate compliance with all applicable ambient air quality standards.

Regulated Sources

- 1.2 Table 1.1 below lists all sources of emissions that are regulated in this permit.

Table 1.1. SUMMARY OF REGULATED SOURCES

Permit Sections	Source Description	Emissions Control(s)
3	Cleaver Brooks Model CB 700-150 6.28 MMBtu/hr natural gas-fired boiler	None
4	Cement silo loading	Baghouse
	Fly ash silo loading	

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The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 2.1. REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive dust	Reasonable control	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.5, 2.15
2.6	Odors	Reasonable control	IDAPA 58.01.01. 775-776	2.7, 2.15
2.8	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.9, 2.15
2.10	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.15
2.11	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.15
2.12	Renovation/de molition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.15
2.13	Air pollution emergency rule	Compliance with IDAPA 58.01.01.550-562	IDAPA 58.01.01.550	2.15
2.14	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	2.15

Facility Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.
- 2.2 Fugitive emissions generated from solid material transport, handling, and storage operations, road traffic and all other sources of fugitive emissions shall be reasonably controlled. Some of the reasonable precautions may include, but are not limited to, the following:
- Use of water or environmentally safe chemicals
 - Application of dust suppressants
 - Use of control equipment
 - Covering of open-bodied trucks
 - Paving
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.3 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.4 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.5 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the

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permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed); any corrective action taken in response to the fugitive emissions; and the date the corrective action was taken.

Odors

- 2.6 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.8 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by the procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.9 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.11 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

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Renovation/Demolition

- 2.12 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

Air Stagnation Advisory Days

- 2.13 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-562.

Test Methods

- 2.14 If testing is required, the permittee shall use the test methods listed in Table 2.2 to measure the pollutant emissions.

Table 2.2. EPA REFERENCE TEST METHODS

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a. and Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or Department-approved alternative in accordance with IDAPA 58.01.01.157

Monitoring and Recordkeeping

- 2.15 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

Reports and Certifications

- 2.16 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

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Permittee: Amcor Precast	AIRS FACILITY No. 027-00085	Date Issued: May 29, 2003
Location: Nampa, Idaho		Date Expires: May 29, 2008

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550 Fax: (208) 373-0287

Obligation to Comply

- 2.17 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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Permittee: Amcor Precast
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3. CLEAVER BROOKS 6.28 MMBTU/HR NATURAL GAS-FIRED BOILER**3.1 Process Description**

The primary purpose of the Cleaver Brooks boiler is to provide process steam for product curing and space heating.

3.2 Control Description

Emissions from this boiler are uncontrolled.

Emissions Limits**3.3 Particulate Matter Emissions**

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, as required by IDAPA 58.01.01.677.

3.4 Opacity Limit

Visible emissions from the Cleaver Brooks boiler stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements**3.5 Fuel**

The permittee shall combust natural gas exclusively in the Cleaver Brooks boiler.

[IDAPA 58.01.01.211.01, 5/1/94]

Monitoring and Recordkeeping Requirements**3.6 Fuel Use Monitoring**

The permittee shall monitor and record the amount of natural gas burned in the Cleaver Brooks boiler once per month to demonstrate compliance with Permit Conditions 3.3, 3.4, and 3.5. Records of the fuel usage shall be kept onsite for the most recent five-year period and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.211.01, 5/1/94]

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4. CEMENT AND FLY ASH SILOS

4.1 Process Description

Cement and fly ash are pneumatically transferred from a delivery truck to separate storage silos. Only one silo can be loaded at a time. Cement, fly ash, aggregate, and sand are transferred into a weigh hopper and then into the concrete mixing equipment. The entire precast product manufacturing process is conducted inside a building.

4.2 Control Description

Particulate matter emissions resulting from cement silo loading and fly ash silo loading are controlled by a single baghouse. Fugitive dust from aggregate and sand transfer points, material transfer to the weigh hopper, and material transfer to the concrete mixing equipment is controlled by being confined in the mixing building.

Emissions Limits

4.3 Emissions Limits

Emissions of PM₁₀ from the cement and fly ash silos shall not exceed any corresponding emissions rate limits listed in Table 4.1.

Table 4.1. SILO EMISSIONS LIMITS

Source Description	PM ₁₀	
	lb/d	T/yr
Cement silo	0.12	0.023
Fly ash silo	0.34	0.06

[IDAPA 58.01.01.211.01, 5/1/94]

4.4 Opacity Limit – Baghouse Stack and Other Point Sources

Visible emissions from the baghouse stack, or any other stack, vent, or other functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

4.5 Production Limits

4.5.1 The concrete production rate shall not exceed 1,392 yd³/day.

4.5.2 The concrete production rate shall not exceed 508,080 yd³ per any consecutive 12-month period.

[IDAPA 58.01.01.211.01, 5/1/94]

4.6 Weigh Hopper and Concrete Mixing Operations

The sand and aggregate transfer from the elevator bins to the weigh hopper above the concrete mixer shall be conducted in a building. The cement and fly ash transfer to the weigh hopper above the concrete mixer shall be conducted in a building.

[IDAPA 58.01.01.211.01, 5/1/94]

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Location: Nampa, Idaho**AIRS FACILITY No.** 027-00085**Date Issued:** May 29, 2003
Date Expires: May 29, 2008**4.7 Cement Silo Loading and Fly Ash Silo Loading**

Particulate matter emissions resulting from cement silo loading and fly ash silo loading shall be controlled by a baghouse.

[IDAPA 58.01.01.211.01, 5/1/94]

4.8 Pressure Drop Measuring Device

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure drop across the cement and fly ash silo loading baghouse.

[IDAPA 58.01.01.211.01, 5/1/94]

4.9 Baghouse Pressure Drop

The pressure drop across the cement and fly ash silo loading baghouse shall be maintained within the baghouse manufacturer and O&M manual recommended pressure drop operating range. Documentation of the baghouse manufacturer recommended pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.211.01, 5/1/94]

Monitoring and Recordkeeping Requirements**4.10 Monitor Operating Parameters**

The permittee shall monitor and record the following operating parameters. These records shall remain onsite for the most recent five year period and shall be made available to Department representatives upon request.

- The concrete production rate shall be monitored and recorded daily and annually to demonstrate compliance with Permit Condition 4.5.
- The pressure drop across the cement and fly ash silo loading baghouse shall be recorded once each time cement and fly ash are loaded into their silos to demonstrate compliance with Permit Conditions 4.7 and 4.9.

[IDAPA 58.01.01.211.01, 5/1/94]

4.11 Operations and Maintenance Manual Requirements

Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the cement and fly ash silo loading baghouse. The O&M manual shall be developed using the baghouse manufacturer recommended operating specifications. The O&M manual shall contain at a minimum, the following information: the manufacturers recommended pressure drop operating range for cement and fly ash PM control; the manufacturers guaranteed PM collection efficiency, or the manufacturers guaranteed grain loading; the airflow through the baghouse, in acfm, induced by the fan; a general description of the baghouse; the normal operation, maintenance, and repair of the baghouse; and the methods of preventing malfunctions and the appropriate corrective actions to be taken in the event of a malfunction. The O&M manual shall be maintained onsite at all times, and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.211.01, 5/1/94]

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Permittee: Amcor Precast
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5. APPENDIX**Table 5.1. SUMMARY OF EMISSION RATE LIMITS**

Source Description	Daily PM₁₀^c Emissions (lb/day)	Annual PM₁₀^c Emissions (T/yr)
Cement silo	0.12	0.023
Fly ash silo	0.34	0.06

^a As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Includes condensibles

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6. PERMIT GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. Performance tests (i.e., air emissions source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

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The permittee shall submit to the Department for approval a proposed test date for each performance test required by this permit at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five workdays advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

10. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.